

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--------------------------------|---|--------------|
| THE CHESTER COUNTY HOSPITAL | : | CIVIL ACTION |
| | : | NO. 02-2746 |
| v. | : | |
| | : | |
| INDEPENDENCE BLUE CROSS, | : | |
| QCC INSURANCE COMPANY, | : | |
| KEYSTONE HEALTH PLAN EAST, and | : | |
| KEYSTONE MERCY HEALTH PLAN | : | |

ORDER

The Motion of Plaintiff the Chester County Hospital for the *pro hac vice* admission of Richard A. Feinstein and Daniel A. Kotchen having come before the Court, and the Court having determined that the application satisfies the requirements of all applicable rules, it is therefore:

ORDERED that Richard A. Feinstein and Daniel A. Kotchen are authorized to appear as counsel for the Plaintiff before the United States District Court for the Eastern District of Pennsylvania in any and all matters that related to the present action.

SO ENTERED this day of , 2002.

BY THE COURT:

Padova. J.

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**MOTION FOR ADMISSION PRO HAC VICE
OF RICHARD A. FEINSTEIN AND DANIEL A. KOTCHEN**

Plaintiff, the Chester County Hospital (the “Hospital”), by its attorneys, Duane Morris LLP, respectfully moves this Court to allow Richard A. Feinstein, Esquire, and Daniel A. Kotchen, Esquire, of Boies, Schiller & Flexner LLP, to appear in this Court for purposes of the above-captioned action.

As set forth in the attached declarations, Mr. Feinstein is a member in good standing of the bars of the Commonwealth of Massachusetts and the District of Columbia and Mr. Kotchen is a member in good standing of the bars of the State of Wisconsin and the District of Columbia. It is the desire of the Hospital that Mr. Feinstein and Mr. Kotchen serve as counsel in the present action. Should the Court grant this Motion, the undersigned, a member in good standing of the Bar of the Commonwealth of Pennsylvania admitted to practice before the United States District Court for the Eastern District of Pennsylvania, shall remain associated with Mr. Feinstein and Mr. Kotchen during the pendency of this matter.

WHEREFORE, plaintiff respectfully requests that the Court grant the Motion and allow the appearance of Mr. Feinstein and Mr. Kotchen.

DUANE MORRIS LLP

By: _____

Lewis R. Olshin
Wayne A. Mack
J. Manly Parks
One Liberty Place, 39th Floor
Philadelphia, PA 19103-7396
215-979-1129/1152/1342

Attorneys for Plaintiff
The Chester County Hospital

Dated: July 15, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-----------------------------|---|--------------|
| THE CHESTER COUNTY HOSPITAL | : | CIVIL ACTION |
| 701 E. MARSHALL STREET | : | NO. 02-2746 |
| WEST CHESTER, PA 19380 | : | |
| | : | |
| PLAINTIFF | : | |
| | : | |
| v. | : | |
| | : | |
| INDEPENDENCE BLUE CROSS, | : | |
| 1901 MARKET STREET | : | |
| PHILADELPHIA, PA 19103 | : | |
| | : | |
| QCC INSURANCE COMPANY, | : | |
| 1901 MARKET STREET | : | |
| PHILADELPHIA, PA 19103 | : | |
| | : | |
| KEYSTONE HEALTH PLAN EAST | : | |
| 1901 MARKET STREET | : | |
| PHILADELPHIA, PA 19103 | : | |
| | : | |
| KEYSTONE MERCY HEALTH PLAN | : | |
| 1901 MARKET STREET | : | |
| PHILADELPHIA, PA 19103 | : | |
| | : | |
| DEFENDANTS | : | |
| | : | |

**DECLARATION OF RICHARD A. FEINSTEIN IN SUPPORT
OF MOTION FOR APPEARANCE *PRO HAC VICE***

I, Richard A. Feinstein, declare and state as follows:

- i. I graduated from Boston College Law School in 1977. I am admitted to practice before the United States Supreme Court, the United States Court of Appeals for the Second, Fourth, Ninth, Eleventh and District of Columbia Circuits, and the United States District Court for the District of Columbia. I am a member in good standing of the bars of the Commonwealth of Massachusetts and the District of Columbia.

ii. I hereby certify that there are no grievances pending against me, and that I have never been reprimanded, suspended, disbarred or have resigned from the practice of law.

I declare under penalty of perjury that the foregoing is true and correct.

Richard A. Feinstein

Dated: July 15, 2002.

**IN THE UNITED STATES DISTRICT COURT
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| KEYSTONE MERCY HEALTH PLAN | : | |
| 1901 MARKET STREET | : | |
| PHILADELPHIA, PA 19103 | : | |
| | : | |
| DEFENDANTS | : | |
| | : | |

**DECLARATION OF DANIEL A. KOTCHEN IN SUPPORT
OF MOTION FOR APPEARANCE *PRO HAC VICE***

I, Daniel A. Kotchen, declare and state as follows:

- i. I graduated from the University of Wisconsin School of Law in 1997. I am a member in good standing of the bars of the State of Wisconsin and the District of Columbia.
- ii. I hereby certify that there are no grievances pending against me, and that I have never been reprimanded, suspended, disbarred or have resigned from the practice of law.

I declare under penalty of perjury that the foregoing is true and correct.

Daniel A. Kotchen

Dated: July 15, 2002.

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2002, a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served via first class mail on the following counsel:

William J. Leonard, Esquire
Obermayer Rebmann Maxwell & Hippel, LLP
One Penn Center, 19th Floor
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1895

John DeQ Briggs
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Lewis R. Olshin